

*[Parties and Counsel Listed on Signature Pages]*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**[PROPOSED] ORDER GOVERNING  
DISCOVERY LIMITATIONS  
APPLICABLE TO META DEFENDANTS'  
PRODUCTION OF HYPERLINK  
REQUESTS**

1 The Court hereby ORDERS the following regarding hyperlink requests by Plaintiffs,  
2 pursuant to the Court's Discovery Management Conference on September 6, 2024 and the associated  
3 Order issued on September 12, 2024.

4 1. Meta will produce responsive, non-produced, and non-privileged internal Meta documents  
5 found at hyperlinks contained within Meta produced documents within 30 days from requests from  
6 Plaintiffs.

7 2. Plaintiffs' requests will list the specific hyperlinks they are asking for production of, in  
8 addition to identifying the document Bates numbers in which each hyperlink appears in accordance with  
9 ESI Stip., App'x 1, ¶ 13 Dkt. 623.

10 3. This applies to documents that are actually hyperlinked in a produced document and does  
11 not extend to documents that are merely referenced by name or description in a produced document. This  
12 Order does not prevent any party from requesting referenced but not hyperlinked documents and the  
13 parties agree to meet and confer in good faith regarding any such requests.

14 4. Before making a request, Plaintiffs will search Meta's existing productions to confirm they  
15 are not able to locate the document themselves.

16 5. If Meta identifies a requested hyperlinked document in its existing production, it will notify  
17 Plaintiffs and identify the produced document Bates number within 3 weeks from receiving the request.

18 6. Plaintiffs shall be allotted one request, by letter, per week for either up to fifty documents  
19 containing hyperlinks or 200 separate hyperlinks, whichever results in a lower number of hyperlinked  
20 documents, inclusive of any hyperlink requests for depositions mentioned below.

21 7. The Parties shall provide the Court with a status update regarding this issue in next  
22 month's DMC Statement.

23 8. For the depositions of M.S. and K.J., scheduled for October 21-22 and October 24-25  
24 respectively, upon completed production of those deponents' custodial files, Plaintiffs shall begin making  
25 reasonable weekly hyperlink requests directed at documents related to those deponents. Meta shall  
26 commence rolling productions of the requested hyperlinks and shall substantially complete production of  
27 the requested hyperlinked documents for these two depositions by no later than October 14, 2024.  
28 Plaintiffs committed at the DMC to use appropriate judgment and avoid unduly burdensome requests for

1 numbers of hyperlinked documents, and thus the Court orders Plaintiffs to abide by this commitment.  
 2 Meta shall communicate transparently with Plaintiffs regarding any specific hyperlinked documents that  
 3 Meta reasonably believe will be difficult to produce by the October 14, 2024, substantial completion  
 4 deadline. Meta shall complete its production of the requested hyperlinked documents for these deponents  
 5 by no later than the Thursday prior to each deponent's scheduled deposition.

6 9. The Court expects the Parties to work collaboratively to identify and prioritize production  
 7 of reasonable numbers of hyperlinked documents prior to the later-scheduled depositions.

8 10. With each production in response to a request, Meta will provide a crosswalk reflecting:  
 9 (a) the production number for the document containing the hyperlink; (b) the hyperlinked text identified  
 10 in Plaintiffs' request; and (c) the production number for the hyperlinked document or a notation reflecting  
 11 the reason the document is not being produced (e.g., that the link is invalid).

12 11. Nothing in this Order prevents any party from seeking relief from this Order. Should the  
 13 weekly hyperlink requests become too burdensome for Meta to produce within the 30-day timeline, or  
 14 should Plaintiffs reasonably require hyperlinks in excess of the parameters set herein or require their  
 15 production on a timeline different than set herein, the parties agree to meet and confer in good faith and,  
 16 if necessary, any party may raise the issue with the Court.

17  
 18 **IT IS SO ORDERED.**

19  
 20 Dated: October \_\_, 2024

21 MAGISTRATE JUDGE PETER H. KANG

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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 30, 2024

By: /s/ Ashley M. Simonsen